REMARKS/ARGUMENTS

The rejections presented in the Office action dated February 10, 2005 have been considered. Claims 1-46 remain pending in the application. Reconsideration of the pending claims and allowance of the application in view of the present response is respectfully requested.

Claims 1-4, 6-7, 10-19, and 22-46 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,640,097 issued to *Corrigan et al.* (hereinafter *Corrigan*).

Applicant respectfully disagrees with the Examiner's characterization of *Corrigan* and the contention that *Corrigan* anticipates these claims. Applicant respectfully asserts that several features recited in claims 1-4, 6-7, 10-19, and 22-46 are not disclosed in *Corrigan.*

To anticipate a claim, the asserted reference must clearly and unequivocally disclose every element of the claimed invention. A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. The identical invention must be shown in as complete detail as is contained in the claim. All claim elements, and their limitations, must be found in the prior art reference to maintain a rejection based on 35 U.S.C. §102.

Independent claims 1, 22, 24, 35, and 45, for example, are directed to systems, devices, and methods involving transmission of Web Services push messages to mobile terminals via one of a plurality of mobile push technologies. One or more Web Services provide the push messages via Web Services protocols. A Web Services push gateway interfaces the push messages provided by the Web services applications to any of a plurality of mobile push technologies.

In contrast to claims 1, 22, 24, 35, and 45, for example, *Corrigan* does not describe Web Services technology. More particularly, *Corrigan* does not teach or suggest one or more Web Services providing push messages via Web Services protocols or a Web Services push gateway. The term "Web Services" is used by those skilled in the art to describe a collection of technologies that have specific functionality and implementation. Web Services are generally known by those skilled in the art to be network-based modular

applications that conform to a specific technical format. The term "Web Services" thus invokes the technical format and communication protocols of a Web Services application which are distinct from web-based applications.

Corrigan describes conversion of messages to mobile push protocols, e.g., SMS, CBS, USSD, CSD/HSCSD, etc. (*see, e.g., Corrigan,* col. 5, lines 56-65). *Corrigan* describes an open API for internet content providers. (*see, e.g., Corrigan,* col. 4, lines 4-20). In contrast to the Applicant's invention, *Corrigan* does not teach or suggest protocol conversion from push messages provided via Web Services protocols (e.g., UDDI, WSDL, SOAP, etc.) to the mobile domain push protocols.

The Applicant respectfully asserts that the portions of *Corrigan* referenced by the Examiner (Fig. 4, col. 4, lines 9-16, col. 3, lines 45-60, col. 10, lines 63-67, col. 5, lines 40-45, and col. 11, lines 15-25) do not support the rejection because there is no teaching at these sections (or elsewhere in *Corrigan*) of Web Services applications or conversion of push messages provided via Web Services protocols.

Corrigan does not disclose Web Service applications providing push messages using Web Services protocols or a Web Services push gateway that interfaces push messages provided by Web services applications to mobile push technologies. For at least these reasons, Applicant's invention, as recited in claims 1, 22, 24, 35, and 45, is not anticipated by *Corrigan*. Dependent claims 2-21, 23, 25-34, 36-44, and 46 are also not anticipated by *Corrigan*, as these claims depend from base claims that are patentably distinct for reasons discussed above.

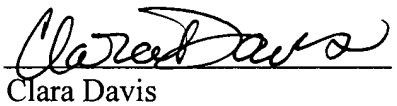
Claim 5 stands rejected under 35 U.S.C. §103(a) as being unpatentable over *Corrigan* in view of U.S. Publication No. 2001/0019951 published for *Haumount et al.* (hereinafter *Haumount*). Claims 8-9 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Corrigan* in view of U.S. Publication No. 2002/0156831 published for *Suorsa et al.* (hereinafter *Suorsa*). Claim 20 stands rejected under 35 U.S.C. §103(a) as being unpatentable over *Corrigan* in view of U.S. Publication No. 2003/0190887 published for *Hook et al.* (hereinafter *Hook*). Claim 21 stands rejected under 35 U.S.C. §103(a) as being unpatentable over *Corrigan* in view of U.S. Publication No. 2003/0050051published for *Vilander* (hereinafter *Vilander*).

Each of the above-listed obviousness rejections relies on a combination of *Corrigan* with another reference. Applicant asserts that *Corrigan* fails to teach the Applicant's invention as recited in independent claims 1, 22, 24, 35, and 45. The arguments presented above in connection with the Examiner's rejection of these claims under 35 U.S.C. § 102(e) as being anticipated by *Corrigan* are reasserted with respect to the Examiner's rejection of claims 5, 8-9, 20, and 21. The asserted references, *Haumount, Suorsa, Hook,* and *Vilander,* do not overcome the deficiencies of *Corrigan* with respect to Web Service applications providing push messages using Web Services protocols or a Web Services push gateway that interfaces push messages provided by Web services applications to any of a plurality of mobile push technologies. For at least these reasons, claims 5, 8-9, 20, and 21 are patentable over the asserted combinations of references.

It is believed that the claims 1-46 are in condition for allowance and notification to that effect is respectfully requested. If the Examiner believes it necessary or helpful, the undersigned attorney of record invites the Examiner to call 651-686-6633 (x111) to discuss any issues related to this case.

Respectfully submitted,

Date: May 10, 2005

By: 

Clara Davis
Reg. No. 50,495